

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15-cv-106-LG-RHW

THE HALIFAX HERALD LIMITED AND JOHN DOE

DEFENDANT

**AGREED MOTION**

COME NOW the parties, *pro se* Plaintiff and Defendant (by its counsel) and jointly move the court to enter the agreed order furnished herewith, suspending the parties' obligations to exchange disclosures, to prepare for the scheduled case management conference, continuing that conference (pending further order) and the opening of discovery, upon the ground defendant is about to file dispositive motions, wherefore the parties agree that, in the interest of conserving the Court's and Movants' resources, the foregoing events should be postponed until the Court has decided the dispositive motions to be urged by Defendant.

WHEREFORE, the parties now move by agreement for an order as aforesaid; Mr. Handshoe has earlier assented to the reliefs sought by his e-mail of May 6, 2014, which was forwarded to this Court at approximately 0949 C.D.T. on May 6, 2014.

**DATED: May 7, 2015.**

Respectfully submitted,

THE HALIFAX HERALD LIMITED

BY: /s/ Jackson H. Ables, III  
OF COUNSEL

BY: /s/ Emily H. Wilkins  
OF COUNSEL

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**CERTIFICATE**

I hereby certify that on **May 7, 2015**, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Douglas K. Handshoe

/s/ Jackson H. Ables, III